

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IP INNOVATION L.L.C. AND
TECHNOLOGY LICENSING CORPORATION,

Plaintiffs,

v.

GOOGLE INC.,

Defendant.

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CASE NO. 2:07CV-503-RRR

JURY TRIAL REQUESTED

**JOINT MOTION TO PERMIT PARTIES TO CONDUCT DEPOSITIONS AFTER
JANUARY 15, 2010**

TO THE HONORABLE JUDGE OF THIS COURT:

Plaintiffs IP Innovation L.L.C. and Technology Licensing Corporation (“Plaintiffs”) and Defendant Google Inc. (“Defendant”) file this joint motion and respectfully ask the Court to permit them to take depositions in this matter after the January 15, 2010 discovery cutoff. Plaintiffs and Defendant would show the Court as follows:

1. At the December 30, 2009 status conference, the Court set January 15, 2010 as the deadline to finish all discovery, including depositions.
2. Plaintiffs and Defendant will be unable to complete all the outstanding depositions by that date. Plaintiffs and Defendant have therefore agreed to schedule certain depositions after January 15, 2010, and respectfully ask this Court to permit this scheduling modification.
3. Plaintiffs and Defendant are working on scheduling in good faith.

The outstanding depositions include: Norman Balder, W. Bruce Croft, Julie L. Davis, Peter Martin, Tal Lavian, Joseph Gemini, Stu Card, the Plaintiffs’ respective Rule 30(b)(6) designees,

and Google's Rule 30(b)(6) designees on certain topics concerning licensing, marketing as to the Google Search Appliance, and document collection and retention.

4. Plaintiffs and Defendant seek this extension of time not for delay but for good cause and that justice may be served. No other deadlines in this matter would be modified by this request.

5. By requesting this scheduling modification, neither party agrees, and rather each party reserves all rights to supplement and/or object to the supplementation of, any expert reports.

WHEREFORE, Plaintiffs and Defendant request that the Court permit the parties to conduct depositions in this matter after the January 15, 2010 discovery cutoff.

Respectfully submitted,

Dated: January 14, 2010

By: /s/ David J. Beck

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Dated: January 14, 2010

Respectfully submitted,

By: /s/ Raymond P. Niro

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Michael E. Richardson

Michael E. Richardson